

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK**

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THOMAS W. McNAMARA, as the Court-  
Appointed Receiver for StratFS, LLC (f/k/a  
Strategic Financial Solutions, LLC), et al.,

Case No.  
1:25-CV-00275

Plaintiff,

vs.

ICE LEGAL, P.A., a Florida Profit Corporation,  
THOMAS ICE, an individual, and ARIANE ICE,  
an individual,

Defendants.

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**NOTICE OF MOTION TO UN-RELATE AND REASSIGN CASE  
TO A DIFFERENT JUDGE AND MAGISTRATE**

**ORAL ARGUMENT REQUESTED  
NOTICE OF INTENT TO FILE REPLY**

Moving Parties:	Defendants, Ice Legal, P.A., Thomas Ice and Ariane Ice
Date and Time	To be determined by the Court.
Place:	Robert H. Jackson United States Courthouse 2 Niagara Square, Buffalo, New York 14202
Supporting Papers:	Memorandum in Support of Motion to Unrelate and Reassign Case to a Different Judge and Magistrate
Answering Papers:	To be filed on a schedule determined by the Court. The moving parties intend to file a reply.
Relief Requested:	An order un-relating this case and reassigning to a random judge.

Grounds For Relief:

There is no factual or legal overlap between the purported “related” cases.

Oral Argument:

The Defendants request oral argument.

Dated: July 25, 2025

**Lundergan Legal, LLC**

/s/ Amanda L. Lundergan

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